

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION,)
Plaintiff)
v.) No. 1:14-cv-00225-AKH
JOHN DOE,)
Defendant.)

CORRECTED DECLARATION OF MICHAEL HANSON

I, Michael Hanson, declare as follows:

1. I am a pilot for Delta Airlines, Inc. ("Delta") and am a member of the Air Line Pilots Association, International ("ALPA"). The Delta Master Executive Council ("MEC") is ALPA's highest local coordinating body at Delta. I am Vice Chairman of the MEC's Strategic Planning Committee at Delta.

2. I have personal knowledge of the facts set forth in this Declaration unless otherwise indicated. I offer this Declaration in support of the Opposition of Non-Party Air Line Pilots Association, International (Including Non-Party Delta Master Executive Council) to Plaintiff's Motion to Compel Compliance with Subpoenas Duces Tecum and to correct a typographical error (changing "November 10, 2014" to "November 10, 2013") in paragraph 6 of my previously-filed Declaration.

3. Attached hereto as Exhibit 1 is a true and correct copy of the DPA UPDATE of June 23, 2014, that I received via e-mail from a Delta pilot who routinely forwards such emails to me. Information identifying the Delta pilot has been redacted from Exhibit 1 to protect the pilot's privacy, as has internal forwarding information. I maintain such emails in the ordinary course of business as Vice Chairman of the Delta MEC's Strategic Planning Committee.

4. Attached hereto as Exhibit 2 is a true and correct copy of a portion of the Facebook Page of the Delta Pilots Association (“DPA”) as it existed as of July 8, 2014.

5. Attached hereto as Exhibit 3 is a true and correct copy of DPA’s Twitter Page, as it existed as of July 8, 2014.

6. Attached hereto as Exhibit 4 is a true and correct copy of a DPA ALERT of November 10, 2013, that I received via e-mail from the same pilot discussed with respect to Exhibit No. 1. Information identifying the Delta pilot who forwarded the DPA ALERT to me has been redacted from Exhibit 4 to protect the pilot’s privacy, as has internal forwarding information. I maintain such emails in the ordinary course of business in my position on the MEC Strategic Planning Committee.

7. Attached hereto as Exhibit 5 is a true and correct copy of a news item from the DPA website (news section) dated July 3, 2014.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 15, 2014

By: 
Michael Hanson

Exhibit 1

REDACTED

From: Delta Pilots Association <dpa@delta-pilots.org>
Date: June 23 2014 10:39:12 PM EDT
To: REDACTED
Subject: DPA UPDATE
Reply-To: dpa@delta-pilots.org

DELTA PILOTS ASSOCIATION

June 23rd, 2014



Independent... Transparent... Efficient... Accountable...YOURS

REDACTED

It may seem to be quiet right now on the DPA front, but the opposite is true. We are working furiously behind the scenes defending your right to pursue independent representation. Our legal pursuit of the person(s)/organization involved in the hacking of our website is producing new details every day. Be patient with us as we move towards a satisfactory conclusion. We continue to cooperate with the FBI in the ongoing criminal investigation as well. We will reveal details as they become public information.

You can help us by challenging those you fly with to consider the quality of representation they are receiving. It is up to all of us to make that change possible. We are currently in an apparent holding pattern with expiring cards being replaced by renewals and a few new members joining us every day. It's going to take a significant boost by acting in unison if we are going to exit this holding pattern.

If we all pitch in together to try to reach ONE pilot each, we can crush this obstacle in short order. Or you can sit back and watch. Time is wasting. You decide.

CARD STATUS

Your Card is EXPIRED. It's time for you to mail in a new Card so we can finally have our vote.

GET ACTIVE FOR DPA

Start by renewing your Card. We can't leave the gate without your support.

RENEW

SUPPORT DPA

We need your financial support right now. Every dollar goes towards waging this campaign and providing you with information and tools you can use to reach your fellow Delta Pilots. DPA does not pay our volunteers for their service during our campaign so your donation goes completely to campaign needs. Thank you for your support!

DONATE

[CLICK HERE TO DONATE](#)

GO DPA!!!

[Forward this email](#)



This email was sent to **REDACTED** by dpa@delta-pilots.org
[Update Profile/Email Address](#) Instant removal with [SafeUnsubscribe™](#) [Privacy Policy](#).

DPA Delta Pilots Association P.O. Box 17025 Tampa FL 33682



Exhibit 2



Delta Pilots Association

Airline Pilots Association

Like

Follow

Message

Timeline About Photos Likes

Post Photo / Video

Share

Post



Delta Pilots Association shared a link.

April 11

Participate in the new DPA FAR 117 Survey! Your input may directly impact ongoing negotiations! As always, submit your answers to this 10 question survey and then go see the live updating results! See the DPA Surveys page to review the final results once the survey closes. Thanks for making your voice heard!



Survey : Questions
survey.constantcontact.com

Like · Comment · Share

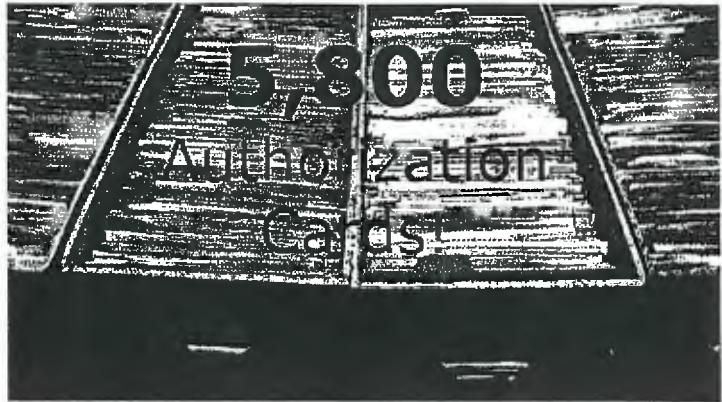
1



Delta Pilots Association

March 26

Celebrate 5,800 DPA members! The renewal of expired cards is all that stands in our way now. Double your efforts to reach new or expired members. It's in your hands now! Thanks for all the hard work to bring us to this amazing number!



Like · Comment · Share

10 2

 Delta Pilots Association
March 5

DPA would like to acknowledge the recent wave of financial support pushing us to over \$176,000 in total donations! Your generosity is aiding our march to independence and our ability to prosecute those who would stand in our way. Thank you.

Please visit our website to add your support.

\$176,351

Like · Comment · Share

21 1

 Delta Pilots Association
January 29

DPA just issued a press release updating important developments in the website hacking lawsuit.

Please see DPA News for the update. We are defending your right to VOTE DPA!

Like · Comment · Share

6 2

 Delta Pilots Association shared a link.
January 12

Here we go! Kick off 2014 with an "interesting" MD-90 takeoff roll! There is much ahead and we need extra horsepower right now to finish our campaign. Throttle up your efforts and we can break away from ALPA once and for all. Thanks for your support!

Ignite 2014

2014 promises to be a big year for Delta Pilots! Check out this interesting MD-90 takeoff roll!

Like · Comment · Share

19 3

PEOPLE

 Delta Pilots Association
December 6, 2013

502 likes

Invite your friends to like this Page

Check out the beginning of our new nationwide billboard campaign! Located on I-85 in ATL/PTC area, this will reach many new Delta Pilots. Donate today to help us spread the word.

ABOUT

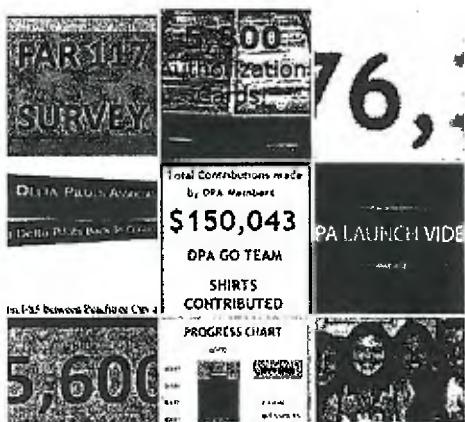
email:

dpa@delta-pilots.org

<http://www.delta-pilots.org/>

Suggest Edits

PHOTOS



Delta Pilots Association

Located on I-85 between Peachtree City and the ATL airport

Like · Comment · Share

31 2

Delta Pilots Association
November 19, 2013

Delta Pilots are truly determined to push us over the edge of success! Today we created the \$150,000 mark in total donations! Thanks to all of you for driving us forward!

Total Contributions made
by DPA Members

\$150,043

Michael · Name · Find Friends

POSTS TO PAGE



Dennis Bateman Sr
May 3 at 10:16am

Looking for Kevin Bubb. He used to fly for Delta a few years ago. Served with him in the Navy and would like to reconnect.

Like · Comment

1

Like · Comment · Share

20 1

Delta Pilots Association
November 14, 2013



Scott Saunders
March 26 at 10:59pm

How many are current?

Like · Comment

The DPA GO TEAM rocked ATL and DTW yesterday! Thanks to all who participated! Join the GO TEAM! Help us expand our scope!

Like · Comment · Share

11



Denis Waldron
March 2 at 1:26pm

Although I support the DPA effort, it looks to me that it has stalled... See More

Like · Comment

1

Delta Pilots Association
November 10, 2013

The attack has been defeated! Our site is secure and fully operational. The attack was simply a redirect of our site to a malicious clone of our site promoting ALPA. Now redouble your efforts and advance our cause!

Like · Comment · Share

8 34

Delta Pilots Association

[English \(US\)](#) · [Privacy](#) · [Terms](#) · [Cookies](#) · [More](#)

Facebook © 2014

November 8, 2013

ALPA has temporarily hijacked and cloned the DPA website. Watch your emails for further communication from DPA. DO NOT visit the site until further notice! Help ALPA realize how bad this decision was. Join the GO TEAM!

Like · Comment · Share

7 12

 Delta Pilots Association shared a link.
November 9, 2013

Here it is! The first look at our successful launch of the GO TEAM in MSP! It went flawless. Flight Ops fully vetted the operation. Pilots got fired up! Join us to expand our GO TEAM in all bases.



DPA GO TEAM Video

The DPA GO TEAM is leading the Delta Pilot group through the final phase of our campaign for exclusive representation. A great moment in Delta Pilot history i...

Like · Comment · Share

11 3

 Delta Pilots Association
November 7, 2013

The DPA GO TEAM celebrates its first event today! Join us in the MSP F Concourse crew lounge! Register for the GO TEAM in your base!

Like · Comment · Share

14

 Delta Pilots Association shared a link.
October 28, 2013

Once you have watched the LAUNCH VIDEO, please help us stretch our donated funds by certifying you have seen the video. We will be ordering DVD's of this video and your certification will reduce our total order and cost. Thank you!

CLICK HERE to certify
survey.constantcontact.com

Like · Comment · Share

5

 Delta Pilots Association shared a link.
October 28, 2013

DPA Launch Video

The DPA Launch Video represents thousands of Delta Pilot volunteer hours and donated dollars! This message is simple and clear...it's time to go! Share this...

Like · Comment · Share

27 6

[See More Stories](#)

Exhibit 3



93

15

185

1

More ▾

Follow

Delta Pilots Assoc.

@DeltaPilots

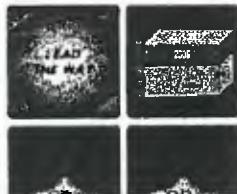
Established May 2010

deltapilotsassociation.org

Joined May 2010

Tweet to Delta Pilots Assoc.

15 Photos and videos



Tweets Tweets and replies

Delta Pilots Assoc. @DeltaPilots · Apr 16

Add a message to your video youtu.be/zL4wqPANTXg?a

Delta Pilots Assoc. @DeltaPilots · Mar 27

Celebrate 5,800 DPA Members! We need your help now to beat the renewal challenge! Speak with your friends and get those cards! GO DPA!!!

Delta Pilots Assoc. @DeltaPilots · Mar 5

DPA thanks our members for the recent wave of financial support pushing us over \$176,000 in total donations!

Delta Pilots Assoc. @DeltaPilots · Jan 29

Delta Pilots Assoc. @DeltaPilots · Nov 14

The DPA GO TEAM rocked ATL and DTW yesterday! Great job to all who participated! Sign up for the GO TEAM!

Delta Pilots Assoc. @DeltaPilots · Nov 10

The attack on the DPA website has been defeated. The site is fully operational and secure. Let's focus on our advance to independence!

Delta Pilots Assoc. @DeltaPilots · Nov 9

ALPA has hijacked and cloned the DPA website! DO NOT go to our site until further notice. Watch email for instructions. Stay the course!

Delta Pilots Assoc. @DeltaPilots · Nov 9

Customize your message youtu.be/PYysE4pCLN0?a

YouTube

All Refresh View

Airlines for America Follow

USAPA Follow

Justin Berg @justinrb. Follow

Popular accounts · Find friends

Recent · Change

Wale

IHOP

Daquan

#Watch5HBOSSonVEVO

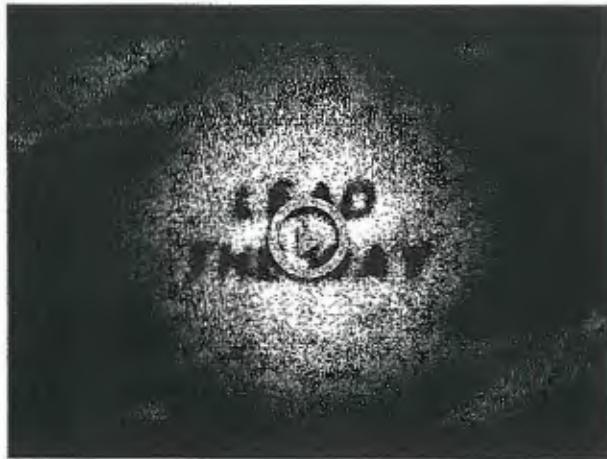
Soul Surfer

#FetusLouisDay

Waffle House

#BeforeMeioDecides

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[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Nov 7

The DPA GO TEAM celebrates its first event! Join us today in the MSP F Concourse crew lounge! Register now for the GO TEAM!

[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Oct 28

Customize your message youtu.be/ITi36nNpln4

[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Oct 28

youtu.be/ITi36nNpln4

Visit our YouTube channel to see the new DPA Launch Video!

[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Oct 12

We just hit \$140,000 donated! 90 GO TEAM Shirts have been contributed! We need more GO TEAM help and more shirt donations! Register now!

[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Sep 28

DPA announces the launch of the GO TEAM! #DPAGOTEAM Be a part of the big finish. See the website GO TEAM page! Register now!

[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Sep 23

DPA has grown to 5,600 Delta Pilots! Celebrate with us and let's keep adding to our numbers. We will have our vote!

[View more photos and videos](#)

Delta Pilots Assoc. @DeltaPilots · Aug 30

We are 5,555 Delta Pilots strong now! We've got financial backing to get us going! What can't we accomplish together!
GO DPA!!!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · Aug 16
BIG NEWS! DPA has secured \$1M in start-up financing from Suntrust Bank! See DPA NEWS for more! GO DPA!!!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · Aug 7
Great news! We just passed 5,500 members and climbing!
Do your best to locate those renewals and new members.
Mail them in! GO DPA!!!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · 26 Jun 2013
We did it! 5,400 DPA Members!
Thank you for working hard on our behalf! Now we focus on renewals and adding a few extra members! GO DPA!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · 13 Jun 2013
25 to go! Start opening every conversation with, "Have you renewed your DPA Card?" If yes....HIGH FIVE! If no....GET THAT CARD! Let's GO!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · 29 Apr 2013
We had a \$1,000 donation today from a senior pilot approaching retirement! Leave a legacy today by donating to DPA!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · 8 Apr 2013
100 cards to go!!! Please decide to do some work for DPA this week! Mail us some cards! Get out there and help us knock out the last few!

◀ ▶ ⚡ ...

Delta Pilots Assoc. @DeltaPilots · 29 Mar 2013
Head over to the DPA Surveys page and complete the TSA Prohibited Items Survey! Take part in true "bottom-up" representation!

◀ ▶ ⚡ ...

- Delta Pilots Assoc. @DeltaPilots · 26 Feb 2013
Check out our new Home Page! Faster access to the items you need at your fingertips! GO GET ONE MORE!



- Delta Pilots Assoc. @DeltaPilots · 9 Feb 2013
We just passed the \$100,000 mark! Thanks to all of you who have brought us this far! Let's take it the rest of the way now!



- Delta Pilots Assoc. @DeltaPilots · 8 Feb 2013
The War Chest: youtu.be/aKNSLumVpHQ via @YouTube

YouTube



View more photos and videos

- Delta Pilots Assoc. @DeltaPilots · 23 Jan 2013
The UAL independence run is well underway! Check out their new website, UnitedPilotsUnion.org. Godspeed to UAL!



- Delta Pilots Assoc. @DeltaPilots · 12 Jan 2013
The DPA Constitution is now live on the DPA website! See what sets us apart from ALPA!



- Delta Pilots Assoc. @DeltaPilots · 30 Dec 2012
Big news! UAL/CAL Pilots have joined DPA in the move to exclusive representation! Read more about the United Pilots Union on DPA News!



- Delta Pilots Assoc. @DeltaPilots · 21 Nov 2012
I liked a @YouTube video from @DeltaPilots youtu.be/FmssZBsyx5M a BODHangoverClip

YouTube





◀ ▶ ★ ... View more photos and videos

- Delta Pilots Assoc. @DeltaPilots · 21 Nov 2012
I uploaded a @YouTube video [youtu.be/FmssZBsyx5M?a](https://youtu.be/FmssZBsyx5M)
BODHangoverClip

YouTube



◀ ▶ ★ ... View more photos and videos

- Delta Pilots Assoc. @DeltaPilots · 26 Oct 2012
The DPA Constitution Survey Part 2 is ready for your input!
See the DPA Surveys page and invest in our future!

◀ ▶ ★ ...

- Delta Pilots Assoc. @DeltaPilots · 25 Aug 2012
DPA UPDATE! We just passed 5,105 DPA Members! We only
need 295 more to file! We have received \$86,887 in
donations as well!! GO DPA!!!!

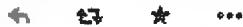
◀ ▶ ★ ...

- Delta Pilots Assoc. @DeltaPilots · 19 Jul 2012
We just grew to 5,000 members and over \$84,000 in
donations! Way to go DPA! Buckle down for the ride to the
finish line! Tell a friend!

◀ ▶ ★ ...

- Delta Pilots Assoc. @DeltaPilots · 7 Jul 2012
We just passed 4,950 members and \$82,895 in donations.

We need only 450 more members to reach the minimum to file! GO DPA!



Delta Pilots Assoc. @DeltaPilots · 24 Jun 2012

DPA UPDATE! We just passed 4,909 Members and \$82,150 in donations! Only 491 Members to go! Don't forget to vote on the TA!



Delta Pilots Assoc. @DeltaPilots · 14 Jun 2012

The TA Analysis is posted to the DPA TA INFO page of our site. The decision is VERY clear!



Delta Pilots Assoc. @DeltaPilots · 6 Jun 2012

4,800 Members and almost \$80,000 in donations! 600 Cards to reach the minimum level for NMB filing! Come on folks....PUSH!!!



Delta Pilots Assoc. @DeltaPilots · 4 Jun 2012

DPA TA Survey is now open! See our homepage deltapilotsassociation.org to speak your mind. View instant LIVE results! Unify!



Delta Pilots Assoc. @DeltaPilots · 30 May 2012

I uploaded a @YouTube video youtu.be/GTpOK4bZvAE?a
DPA No Fear Video



[View more photos and videos](#)



Exhibit 4

REDACTED

From: Delta Pilots Association <dpa@delta-pilots.org>
Date: November 10, 2013 at 7:26:10 AM EST
To:
Subject: DPA ALERT! Attack Defeated!
Reply-To: dpa@delta-pilots.org



REDACTED

ALERT! The DPA Site is now back up and running.

We have defeated the initially successful attempt to redirect our site to a clone site "deltapilot.org". That site has been disabled, but still could resurface and be dangerous so we recommend you clear your browser from all history and cookies before heading back to our site.

When you search Delta Pilots Association in Google, our site is once again

properly reached through the results.

The site is secure and functioning properly. Again, our site was not compromised internally. No data was lost or accessed. We do not store member data on the DPA website as a side note. The hijacking was simply a redirecting of our URL to a hostile site that asked the reader to support ALPA and may have contained other malicious content. Thank you to all who demonstrated patience and restraint during this event.

Evidently, attacks are stepping up right along with our resolve to defeat them. In any battle, there will be moments where the enemy advances. While we experienced a temporary disruption to our website access, our resolve was not weakened, it was strengthened.

Several of you asked about whether or not revoking ALPA dues check-off would require you to stop paying dues. Dues Check-off is simply automatic withdrawal. ALPA must bill you manually if you revoke your dues check-off. We are not suggesting that you not pay your dues nor are we suggesting that you become an objecting non-member. Those steps are not warranted or prudent at this time.

REPRINT: In contrast to ALPA's pressure tactics in layover hotels and dirty maneuvers like hacking our website, the DPA *GO TEAM* just had a fantastic first event in MSP! Watch the one minute video recap hosted on our DPA *GO TEAM* dedicated page to see how effective the *GO TEAM* is! DAL Flight Operations vetted our actions throughout the day and we have their full approval.



Click image above to watch.

With ALPA stepping up the attack at all levels, word-of-mouth, and therefore the *GO TEAM*, just got more important. Let ALPA's actions motivate you to join the *GO TEAM* and let's swamp the bases with Delta Pilots who will no longer tolerate ALPA.

[CLICK HERE](#) to join the *GO TEAM*.

Carry AUTHORIZATION CARDS with you right now and have a fellow Delta Pilot join us or renew their Card right now.

[CLICK HERE](#) to contribute to DPA.

Mail checks and Authorization Cards to:

DPA
P.O. Box 17025
Tampa, FL 33682

STAY THE COURSE!



today!

Thank you for your support!

Tell another Delta Pilot about our drive for exclusive representation

[Delta Pilots Association](#) | P.O. Box 17025 Tampa FL 33682-7025

Exhibit 5

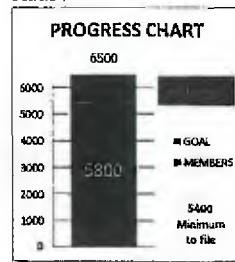


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7025

dpa@delta-pilots.org

CLICK
ON
CHART
to see
more
statistics



YES
DPA

CLICK
IMAGE

Twitter

@DeltaPilots
The
DPA
GO
TEAM
rocked
ATL
and
DTW
yesterday!
Great
job to
all
who
participated!
Sign
up for
the
GO
TEAM!
about
7
months

7/7/2014

Delta Pilots Association - DPA News - DPA Files Motion to Compel ALPA in Website Hacking Case

ago

Older



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@DeltaPilots

Search

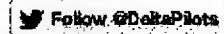
DPA Links

- [DPA](#)
[Text](#)
[Messages](#)
- [Membership](#)
[Registration](#)
- [DPA](#)
[Authorization](#)
[Card](#)
- [DPA](#)
[Introduction](#)
- [DPA](#)
[Mission](#)
- [About](#)
[Becoming](#)
a
[Member](#)

Other DPA
Links

- [DPA](#)
[Constitution](#)
- [Email](#)
[Us](#)

DPA CHANNEL



Thursday
Jul032014
July 3, 2014

DPA Files Motion to Compel ALPA in Website Hacking Case

On November 8th and 9th, 2013, the DPA website was maliciously

<http://delta-pilots.org/dpa-news/2014/7/3/dpa-files-motion-to-compel-alpa-in-website-hacking-case.html>

redirected to the phony pro-ALPA webpage image linked below:

PHONY WEBSITE USED IN ATTACK ON DPA

This attack prompted the commencement of a criminal and civil investigation. DPA filed a civil lawsuit in Federal Court and was granted subpoena authority to collect information on the individual(s)/organization potentially involved. Because of specific statements made by ALPA in their "True Headings" series of communications, ALPA National and the Delta MEC were served with subpoenas. ALPA National responded by providing DPA with a letter they allegedly received shortly after the attack last November from a Delta Pilot claiming to being involved in some way. Incredibly, ALPA National removed the name from the letter and has refused to provide the complete documentation including the names of the persons mentioned in the letter (author and "witness"). DPA filed a Motion to Compel along with the evidence linked below to cause ALPA to reveal the names of the people they know have been involved since around the time the attack occurred.

Several comments in the "True Headings" series (written after the letter was received) are noteworthy:

"We are highly skeptical that anyone hacked DPA's website and strongly believe that whatever temporary problems the DPA experienced were the result of inadvertent actions by a third party, or even the DPA itself."

"The simple fact is that any such inquiry will inevitably establish that the DPA's charges against the Association are wholly without merit."

ALPA told the members that DPA experienced a "temporary problem" or "errors in managing DNS records".

Now pressed by DPA's steady progress in the case, ALPA chooses to conceal the identities of those involved claiming "client-attorney privilege". Delta Pilot dues dollars are being spent inappropriately in covering potential knowledge about a possible felony committed. Delta Pilots and even ALPA volunteers who are beginning to see the truth behind this story are encouraged to consider which side of the fence they are standing on and will they be proud to be there once this investigation is complete.

DONATE

We need your support and a great deal of resources to carry this to trial where justice will be served. While DPA has operated in a manner we can all be proud of, our opposition chooses to break the law. We will defend your rights with your help. DPA requests that you consider making a substantial contribution now.

MOTION TO COMPEL

DECLARATION

EXHIBIT A - Subpoena served on ALPA National and associated True Headings evidence

EXHIBIT B - Subpoena served on Delta ALPA MEC

EXHIBIT C - ALPA National response letter to subpoena

EXHIBIT C PART 2 - ALPA National response to include letter from Delta pilot

EXHIBIT C PART 3 - ALPA National response to include other documents

EXHIBIT D - DPA response to ALPA refusal to provide documents

7/7/2014

Delta Pilots Association - DPA News - DPA Files Motion to Compel ALPA in Website Hacking Case

EXHIBIT E - ALPA National second response

EXHIBIT F - ALPA National final response

MEMORANDUM OF LAW

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